

# Juliette Gust

Founder & President



- Creator of [HotelEthics.com](https://www.hotelethics.com), [RestaurantEthics.com](https://www.restaurantethics.com), and MyEthicsSuite, an anonymous employee reporting and incident tracking platform
- Former global Director of Investigations and Anti-Corruption program project manager for lodging company with 180,000 employees in 100+ countries
- More than 1,500 investigations in 75 countries and 10,000+ ethics line reports reviewed

A panoramic view of the Houston skyline, featuring several prominent skyscrapers like the Bank of America Tower and the JP Morgan Chase Tower. The foreground shows a river with a bridge and lush green trees. The image has a semi-transparent overlay.

# Managing Internal Investigations

THE HOSPITALITY LAW CONFERENCE: SERIES 2.0 - HOUSTON

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# Why Investigate?

Businesses Lose Almost \$1 Trillion to Occupational Fraud

#Metoo and the hotel industry

Restaurants after #MeToo: How this 'wake-up call' is impacting harassment training

Gartner Says Just 41 Percent of Workplace Misconduct Is Reported

Investors Say 'Us Too' In Wake Of Sexual Misconduct Claims

Whistleblowers Are a Sign of Healthy Companies

# What to Investigate?

- Ethics Line reports
- Code of Conduct/Company Policy violations
- Management/Internal Audit concerns
- Social Media posts
- Consumer complaints

# Investigations Stakeholders

- Finance
  - Legal
  - HR
  - IT
  - Risk Management
  - Operations
  - Sales & Marketing
- Proximity
  - Expertise
  - Relationships
  - Influence
  - Intel

# Resources

- Technical skills
  - Location
- Language skills
  - Ease of deployment
- Interview skills
  - Risk tolerance
- Cultural awareness

# Preparation

- Legal guidance
- In-country resources
- Historical information
- Risk assessments
- Security assessments
- Travel warnings

# Challenges

- Privacy concerns
- Employment laws
- Cost
- Safety and security
- Maintaining privilege
- E-discovery
- Retaliation



# Best Practices

- Evaluate internal controls
- Conduct risk analyses
- Develop proactive audits, reviews, and training based on risk
- Identify key third-party relationships

# Best Practices (cont.)

- Review and update your policies
  - Code of Business Ethics/Conduct
  - Whistleblower and Anti-Retaliation
  - Social Media
  - Conflicts of Interest
  - Anti-Corruption/Anti-Bribery